

UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF PENNSYLVANIA

In re:	:	CASE NO. 5:18-00225-MJC
	:	CHAPTER 13
David E. Sinclair	:	
Debtor,	:	
Jack N. Zaharopoulos, Trustee,	:	
	:	
Objector,	:	
Bank of America, N.A.,	:	
	:	
Objector,	:	
David E. Sinclair,	:	
	:	
Respondent.	:	

**STIPULATION RESOLVING (1) CHAPTER 13 TRUSTEE'S OBJECTION AND (2) BANK
OF AMERICA, N.A.'S OBJECTION TO DEBTOR'S MOTION TO SELL REAL ESTATE**

AND NOW, the Chapter 13 Trustee, Jack N. Zaharopoulos; Bank of America, N.A.; and the Debtor, David E. Sinclair; stipulate and agree as follows:

1. The Debtor filed a Motion to Sell Real Property of the Estate Free and Clear of Liens and Encumbrances on May 11, 2023. *See* Docket #57.
2. The Chapter 13 Trustee and Bank of America, N.A. both objected to the Debtor's Motion. *See* Docket #64 and #69, respectively.
3. The Chapter 13 Trustee, Bank of America, N.A. and the Debtor all stipulate and agree that both Objections to the Motion to Sell shall be resolved with the Debtor submitting to the Court within 7 days of this Honorable Court approving this Stipulation, a new proposed Order approving the Debtor's Motion to Sell Real Property of the Estate Free and Clear of Liens and Encumbrances containing the following language:

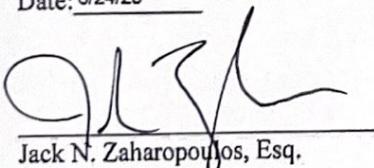
a. Paragraph (f.) of the existing proposed Order (see Docket #57-3) shall be changed to state, "Bank of America, N.A. will be paid the full amount of the loan balance at closing, pursuant to a written payoff to be provided by Bank of America, N.A. and the mortgage lien will not be released until Bank of America, N.A. is paid in full."

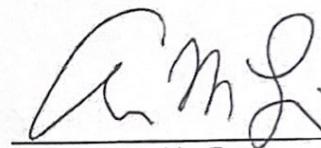
b. An additional paragraph, stylized as Paragraph (g.), will be added to the proposed order stating that "A payment shall be made to the Chapter 13 Trustee at closing in an amount to pay all allowed claims at a 100% dividend."

WHEREFORE, the undersigned parties respectfully request that the Court enter an Order approving this Stipulation and the terms contained herein.

Patrick J. Best

Patrick J. Best, Esq.
Counsel for Debtor
Date: 6/24/23


Jack N. Zaharopoulos, Esq.
Chapter 13 Trustee
Date: 6/24/23



Andrew M. Lubin, Esq.
Counsel for Bank of America, N.A.
Date: 6/26/23